

# **EXHIBIT 175**

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION  
4

5 Civil Action No. 1:17-cv-02989-AT  
6

7 \_\_\_\_\_  
8 DONNA CURLING, et al.,

9 Plaintiffs,

10 vs.

11 BRAD RAFFENSPERGER, et al.,

12 Defendants.  
13 \_\_\_\_\_

14 VIDEOTAPED DEPOSITION OF DEAN M. FELICETTI

15 DATE: September 2, 2022

16 TIME: 9:12 a.m. to 4:28 p.m.

17 LOCATION: Witness location  
18

19 REPORTED BY: Felicia A. Newland, CSR

20 Veritext Legal Solutions

1250 Eye Street, N.W., Suite 350

21 Washington, D.C. 20005  
22

1 example?

2 A Yes.

3 Q And there was a hard drive that was  
4 also produced by Mr. Maggio. Were you aware of  
5 that?

6 A Produced how?

7 Q It was a literal hard drive that had  
8 files and data on it.

9 A Produced?

10 Q To us.

11 A Oh, no.

12 Q Okay. Were you aware before now that  
13 there was a hard drive that was produced by  
14 Mr. Maggio?

15 A I know there was a hard drive. I'm  
16 not sure where it was produced to.

17 Does that make sense?

18 Q Yes.

19 So, just for context, when you talk  
20 about the team members that -- and the services  
21 provided, you're talking about the services that  
22 were provided by a team that included Paul Maggio

1 with respect to copying and preserving data from  
2 election equipment in Coffee County. Is that  
3 right?

4 A Yes.

5 Q Okay. And are you aware that  
6 Mr. Maggio produced to us a hard drive that had  
7 data that that team had copied from Fulton County?

8 A Yes.

9 Q Okay. I'm sorry, I --

10 A No, no. I should have asked.

11 Q Let me clean up the question because  
12 I misspoke.

13 A Yeah.

14 Q Produced to us a hard drive that had  
15 the data that that team copied from Coffee County?

16 A Yes.

17 Q Okay. And did you look at -- at  
18 those files in whatever form the firm has them?

19 A No. I looked at the reports, not the  
20 actual files.

21 Q Okay. And when you say "reports,"  
22 what do you mean?

1                   Q       Who engaged SullivanStrickler to do  
2       the work in Coffee County?

3                   A       Jim --

4                   Q       Penrose?

5                   A       Yes, Jim Penrose and Doug Logan.

6                   Q       When did they first reach out to  
7       SullivanStrickler for the work, approximately?

8                   A       Early January for Coffee County.

9                   Q       What's the basis for that testimony?

10                  A       Can you repeat the question?

11                  Q       Sure.

12                               What's -- what's the basis for your  
13       understanding that Mr. Penrose and Mr. Logan  
14       reached out to the firm, specifically for Coffee  
15       County, in early January?

16                  A       By virtue of requests for other  
17       services outside of Coffee County. The request  
18       came in that pointed to Coffee County, I believe,  
19       in early January.

20                  Q       Okay. And just so I understand, for  
21       that testimony, are you relying on documents you  
22       looked at or people you spoke with or both?

1 discussions with Mr. Maggio and others?

2 A Yes.

3 Q The work that was done in Coffee  
4 County, was that done -- was the customer for that  
5 work Sidney Powell?

6 A Sidney Powell paid the bills.

7 Q What's your understanding of who the  
8 customer was for the purpose of the engagement  
9 agreement for the Coffee County work?

10 A Sidney Powell. Very good.

11 Q So is it SullivanStrickler's  
12 understanding still today that Sidney Powell had  
13 all of the necessary legal rights and permissions  
14 for the work that she engaged SullivanStrickler to  
15 do in Coffee County?

16 A Yes, sir.

17 Q What is the basis for that  
18 understanding?

19 A Borrowed license at the time -- no,  
20 see, I don't -- I don't know.

21 Q That's okay.

22 A Yeah, sorry.

1 Q Okay. Are you familiar with Scott  
2 Hall?

3 A I am.

4 Q How do you know Scott Hall?

5 A Based on discussions with the team  
6 and his involvement in the collections.

7 Q What is your understanding of his  
8 involvement with the collections?

9 A That he was on-site.

10 Q In Coffee County on January 7th --

11 A Yes, sir.

12 Q I'm sorry, let me just make sure I  
13 get the question done.

14 A Yeah. Yeah. I'm sorry.

15 Q No, you're good. It's common.

16 All right. And did you discuss with  
17 Mr. Maggio Mr. Hall's involvement in the Coffee  
18 County project?

19 A Yes, sir.

20 Q What did Mr. Maggio have to say about  
21 Mr. Hall's involvement?

22 A He was a senior --

1 sends, right?

2 A Yes, sir.

3 Q Okay. So what we see here is on  
4 January 7, 2021 at 11:09 a.m., Ms. Latham sends a  
5 text to Mr. Maggio with an address in Douglas,  
6 Georgia.

7 Do you see that?

8 A Yes, sir.

9 Q Are you aware that that's the address  
10 for the Douglas local airport?

11 A I am not.

12 Q Okay. And then Mr. Maggio responds a  
13 minute later, "Received. We will pick up Scott."  
14 Do you see that?

15 A Yes, sir.

16 Q Did you understand that Scott Hall  
17 flew into the Douglas, Georgia airport on the  
18 morning of January 7 --

19 A Yes, sir.

20 Q -- of 2021?

21 Okay. And so what we see here is  
22 Ms. Latham coordinating with Mr. Maggio on somebody



1 is picking up Scott Hall from the airport, right?

2 A Yes.

3 Q And then another minute later  
4 Mr. Maggio writes back, "Better yet, have Eddie  
5 pick up Scott. Our vehicle is full. We will meet  
6 him there."

7 Do you see that?

8 A Yes, sir.

9 Q Who actually drove the team to  
10 Maggio? Like literally drove the vehicle?

11 A Jim Nelson.

12 Q Do you know what kind of vehicle they  
13 were in?

14 A I know he has a truck.

15 Q Okay. Like a pickup truck?

16 A Yeah. But I don't know if that's  
17 what he drove. And as far as in that truck, there  
18 were three people; so it was Jim, Paul, and  
19 Jennifer.

20 Q And how did Ms. Naik get there?

21 A She had to drive and pick up a  
22 Cellebrite, one of our forensic tools. So she had

1 to go and get it from, I believe, the office and  
2 then meet everyone there.

3 Q So Ms. Naik separately drove to  
4 Douglas?

5 A To -- not to Douglas. Is that where  
6 Coffee County is?

7 Q Yes.

8 A Oh, then yes. Yes. Sorry.

9 Q That's okay.

10 And she drove there alone?

11 A Yes.

12 Q Did she drive back alone?

13 A Yes, sir.

14 Q And the other three rode back in  
15 Mr. Nelson's vehicle?

16 A Yes, sir. Well, I believe his  
17 vehicle. He drove.

18 Q Understood.

19 Okay. Then Ms. Latham writes back to  
20 Mr. Maggio at 11:30 a.m., "How far out" -- sorry.  
21 She writes back, "How -- how far out are you?"

22 Do you see that?

1 A Yes, sir.

2 Q And Mr. Maggio responds, "We are in  
3 town waiting for Scott to let us know when to pull  
4 in." Do you see that?

5 A Yes, sir.

6 Q Where did the team wait for the green  
7 light from Scott Hall?

8 A I believe the parking lot.

9 Q Of the Coffee County elections  
10 office?

11 A Yes, sir.

12 Q A pen with a light on it?

13 A Oh, it's very cool. I got it  
14 yesterday. I'm sorry. I don't even use it. It  
15 kind of tweaks me out a little, so I want to  
16 apologize.

17 Q Oh, no, that's fine.

18 A I'm sorry.

19 Q Do I understand correctly, the team  
20 was waiting for Mr. Scott Hall to give them  
21 direction that it was time to go into the elections  
22 office?

1                   A       Yes, sir.

2                   Q       Do you have any understanding of what  
3 they were waiting for?

4                   A       Other than Scott being a senior --  
5 sorry, a senior leader on this effort in Coffee  
6 County, no.

7                   Q       When did the firm first start taking  
8 direction from Scott Hall for Coffee County as  
9 opposed to taking direction directly from Jim  
10 Penrose, Doug Logan or Sidney Powell?

11                  A       It wasn't as much direction as  
12 general, if you have an issue, you collect  
13 everything type of deal.

14                  Q       Okay.

15                  A       Nothing is specific. And that was  
16 provided by the other folks.

17                  Q       Since the Coffee County was done  
18 pursuant to the engagement with Sidney Powell, was  
19 it the understanding of SullivanStrickler that  
20 Scott Hall was part of that Sidney Powell team, and  
21 that's --

22                  A       Yes.

1                   Q       Okay. And what was the basis for  
2       that understanding?

3                   A       I don't know.

4                   Q       Okay. And so, again, looking back at  
5       the text between Mr. Maggio and Ms. Latham  
6       coordinating the team's arrival and getting Scott  
7       Hall there, do I understand correctly that  
8       Ms. Latham was also a key point of contact for the  
9       SullivanStrickler team with respect to the Coffee  
10      County work?

11                  A       Yes, sir.

12                  Q       So she was one of the primary points  
13      of contact for organizing and facilitating the work  
14      in Coffee County?

15                  A       Yes, sir.

16                  Q       Oh, do you know who Eddie is?

17                  A       I do not.

18                  Q       Do you know how Scott Hall got from  
19      the airport in Douglas to the Coffee County  
20      elections office?

21                  A       I do not.

22                  Q       Do you know if someone traveled with

1 Scott Hall?

2 A I do not.

3 Q In your prep for this, did you learn  
4 that Mr. Hall arrived at the elections office with  
5 another person?

6 A I did not.

7 Q Okay.

8 A Yeah.

9 Q If we look at the next page,  
10 January 7 at 11:42 a.m., this is a text from Cathy  
11 Latham to Paul Maggio, sending a picture of Scott  
12 Hall, right?

13 A I --

14 Q I'm sorry. No, no, I got that wrong.  
15 I got that wrong. This is a separate text.

16 A Yeah.

17 Q This is a text from Scott Hall to  
18 Paul Maggio sending a picture of himself?

19 A Yes, sir.

20 Q Got it. Okay.

21 And that's at 11:42 a.m. on  
22 January 7th?

1 A Yes, sir.

2 Q Okay.

3 All right. Let me hand you  
4 Exhibit 10.

5 A Yes, sir.

6 (Felicetti Deposition Exhibit Number 10  
7 marked for identification.)

8 BY MR. CROSS:

9 Q Actually before you look at that, a  
10 couple of questions that I forgot to ask you.

11 A Yes, sir.

12 Q So your standard practice is to --  
13 you typically are engaged by lawyers or law firms  
14 for your work. Is that fair?

15 A Yes.

16 Q And so the lawyers or law firms, they  
17 will have a client that they are working on behalf  
18 of for the work that they hire you for?

19 A Yes.

20 Q Who is Mr. Binnall's client for that  
21 engagement?

22 A For?

1                   Q       For the engagement agreement that we  
2       saw signed.

3                   A       I don't know.

4                   Q       Okay. And if you wanted to know, who  
5       would you ask?

6                   A       Paul Maggio.

7                   Q       Okay. And who was Ms. Powell's  
8       client for the engagement that we saw with respect  
9       to Coffee County?

10                  A       I don't know.

11                  Q       Okay. Who would you ask?

12                  A       Paul Maggio.

13                         MR. CROSS: Could we ask before the  
14       deposition ends if he could ask Mr. Maggio who the  
15       clients were?

16                         MR. COLEMAN: Yeah, that's fine.

17                         MR. CROSS: Okay. Thank you.

18       BY MR. CROSS:

19                   Q       And then you mentioned Ms. Naik  
20       picked up a -- is it a Cellebrite kit?

21                   A       Yeah, Cellebrite. Yeah, a dongle  
22       kit.



1 Q What is that used for?

2 A It's used for forensically capturing  
3 certain devices.

4 Q What types of devices?

5 A Mobile typically, iPads.

6 Q Was that needed for the poll pads in  
7 Coffee County?

8 A It was.

9 Q Where did Ms. Naik get that kit?

10 A I believe at our office.

11 Q In Atlanta?

12 A Yes, sir.

13 Q So that's -- that's a standard device  
14 that you guys have?

15 A Yes.

16 Q Okay.

17 All right. Take a look at  
18 Exhibit 10, if you would. You, yourself, have not  
19 been on-site in the Coffee County elections office?

20 A I have not been on-site.

21 Q Okay. So what we have here, we had a  
22 deposition with the Coffee County Board of

1 Elections yesterday on this. These -- these are  
2 screenshots from surveillance video that was  
3 produced by Coffee County to us.

4 A Okay.

5 Q So what it is, there is a camera  
6 sitting outside the front door of the elections  
7 office and it shows people going in and out of the  
8 elections office.

9 Do you understand that?

10 A Yes, sir.

11 Q Okay. So let me just see -- there  
12 are some people I want to ask you about.

13 MR. COLEMAN: I was going to say I  
14 don't think it's uploading to the FileShare.

15 MR. CROSS: The photos?

16 MR. COLEMAN: Yeah.

17 MR. CROSS: Yeah, it's a little bit  
18 slow, I think, because it's a very large document.

19 Do we happen to have an extra one?

20 MR. SPARKS: We don't.

21 MR. CROSS: Okay.

22 MR. SPARKS: I'm getting ready to --

1 MR. CROSS: Yeah, it's a very, very  
2 large -- yeah.

3 We can go off the record for a  
4 moment.

5 VIDEOGRAPHER: The time is 11:16 a.m.  
6 We are off video record.

7 (Recess from 11:16 a.m. to 11:17 a.m.)

8 VIDEOGRAPHER: The time is 11:17 a.m.  
9 We are back on video record.

10 BY MR. CROSS:

11 Q Before we look at the picture, we  
12 talked earlier that Ms. Latham was one of the  
13 principal points of contact organizing the Coffee  
14 project. Do you recall that?

15 A Yes, sir.

16 Q Ms. Latham was literally the person  
17 who welcomed Mr. Maggio and his team at the  
18 elections office the morning of January 7th, 2021.  
19 Is that right?

20 A Yes, sir.

21 Q And when they arrived, she presented  
22 herself as a Coffee County elections official. Is

1           that right?

2                   A       Yes, sir.

3                   Q       If we look at page 33 in Exhibit 10  
4           in the -- the screenshots of the video provided by  
5           Coffee County, you'll see here Mr. Maggio is in the  
6           grey sweater, right?

7                   A       Uh-huh. Yes, sir.

8                   Q       And Jim Nelson is next to him in the  
9           khaki pants?

10                  A       Yes.

11                  Q       Jennifer Jackson is in front in the  
12           pink jacket?

13                  A       Yes.

14                  Q       And do you understand that's Cathy  
15           Latham escorting them into the building?

16                  A       I don't know.

17                  Q       Okay. That's fine.

18                           Then if we come to the next page, we  
19           see the same woman with grey hair holding the door  
20           open and Mr. Maggio and Mr. Nelson are walking in,  
21           right?

22                  A       Yes, sir.

1 Q And this is at 11:43 a.m. on  
2 January 7, 2021, right? If you look at the top,  
3 the timestamp.

4 A Oh, okay. Yes, sir.

5 Q All right. Flip to, it looks like,  
6 page 38. So here you have -- do you see the  
7 timestamp just above the photo, January 7, 2021 at  
8 11:50 a.m.?

9 A Yes, sir.

10 Q We have the same woman with grey  
11 hair. Do you see her?

12 A Yes, sir.

13 Q She's escorting two individuals into  
14 the building, right?

15 A Yes, sir.

16 Q Do you recognize the one behind her  
17 as Scott Hall, the person that we saw in the  
18 picture before?

19 A I do.

20 Q Okay. And then do you know who the  
21 second individual is coming in with Mr. Hall and  
22 Ms. Latham?

1 A I do not.

2 Q If you wanted to know who that  
3 individual was, who would you ask?

4 A One of the team members from  
5 SullivanStrickler that were there.

6 MR. CROSS: Amanda, if we could get  
7 that answer before the end of the deposition?

8 MS. CLARK-PALMER: Yes.

9 MR. CROSS: Thank you.

10 BY MR. CROSS:

11 Q All right. Now come to page 42.

12 MR. SPARKS: One second. I need this  
13 in an e-mail, I think, maybe in order to do that.

14 MR. CROSS: Yeah, we will do that.  
15 E-mail Jenna. I think we may have to do it as a  
16 FileShare, an FTP, because it's big, but --

17 MR. SPARKS: I will.

18 MR. CROSS: Thanks.

19 MR. RUSSO: Can you put on the record  
20 the page number for that?

21 MR. CROSS: In the exhibit?

22 MR. RUSSO: Yeah. The page -- the

1 page that you're looking at there. You may have  
2 sent it, but I --

3 MR. CROSS: Page 38, yeah. I'm  
4 sorry.

5 BY MR. CROSS:

6 Q All right. Flip to page 42. So here  
7 we have Mr. Nelson and Mr. Maggio walking out of  
8 the building at 12:15 p.m. on January 7, right?

9 A Yes.

10 Q And then again at 12:17 p.m.,  
11 January 7, we have Mr. Maggio and Mr. Nelson coming  
12 back in, right?

13 A Yes, sir.

14 Q Mr. Maggio is carrying a black bag?

15 A Yes.

16 Q What was in that bag?

17 A Forensic collection materials,  
18 devices.

19 Q Standard devices you would --

20 A Standard -- industry-standard  
21 forensic tools.

22 Q And do you see that Mr. Nelson is

1           wheeling some kind of case in?

2                   A       Yes, sir.

3                   Q       What was in that case?

4                   A       Forensic collection tools.

5                   Q       So this is something Mr. Nelson  
6           brought in with him?

7                   A       Yes, sir.

8                   Q       All right. Did the SullivanStrickler  
9           team take any equipment or devices from the Coffee  
10          County office when they left?

11                           Sorry, let me ask a better question.  
12          Obviously it's a really broad one. Let me ask a  
13          better question.

14                           Did the SullivanStrickler team take  
15          any of the -- did they take any equipment or  
16          devices from Coffee County when they left the  
17          Coffee County office that they did not themselves  
18          bring in?

19                   A       They did not.

20                   Q       So, for example, did they take a BMD  
21          with them, the vote -- the touchscreen voting  
22          devices?



1 A No, sir.

2 Q So the only thing they took out were  
3 any devices they brought in, plus the data that  
4 they copied from inside the office?

5 A Yes.

6 Q All right. Flip to page 51. So  
7 we're at 12:56 p.m. on January 7, 2021. Do you see  
8 that?

9 A Yes.

10 Q So Mr. Nelson is holding a Coffee  
11 County elections office door open. Mr. Maggio is  
12 standing with him, right?

13 A Yes, sir.

14 Q Who's the woman they're talking to?

15 A That is Karuna Naik.

16 Q And she has a bag also, right?

17 A Yes, sir.

18 Q Did she also -- she brought in a  
19 Cellebrite kit, right?

20 A Yes, sir.

21 Q Did she bring any other devices?

22 A She may have.

1                   Q       Okay. But she also did not take  
2                   anything out of the office that she, herself, or  
3                   the team did not bring in?

4                   A       Correct.

5                   Q       Other than the data?

6                   A       Yes, sir.

7                   Q       Okay.

8                             All right. Flip to page 55. So now  
9                   we're at January 7, 2021 at 1:19 p.m. Cathy Latham  
10                  is standing at the door talking to a man in a black  
11                  hat.

12                            Do you see that?

13                  A       Yes, sir.

14                  Q       Do you know who that is?

15                  A       I do not.

16                  Q       And then if you come back to page 57,  
17                  the same man, it looks like he's bringing in  
18                  takeout containers at 1:23 p.m.

19                            Do you see that?

20                  A       Yes, sir.

21                  Q       Someone brought lunch in for the team  
22                  so they could continue working in the office,

1 right?

2 A Yes, sir.

3 Q Did Scott Hall pay for the lunch?

4 A I don't know.

5 Q Do you know who took care of lunch in  
6 terms of going to get it, organizing it?

7 A I don't.

8 Q Will you look at page 60?

9 There's a man coming in, grey hair,  
10 grey beard, January 7, 2021 at 1:39 p.m. Do you  
11 recognize him as Ed Voyles?

12 A No.

13 Q Do you know the name Ed Voyles?

14 A I do not.

15 Q Do you know the name Eric Chaney?

16 A I know the name Eric Chaney.

17 Q And do you understand that Eric  
18 Chaney was a member of the Coffee County Elections  
19 Board at the time of the Coffee County collection?

20 A I did not.

21 Q During the time that the  
22 SullivanStrickler team was in the Coffee County

1 election office on January 7, you're aware that  
2 there was at least one member of the Coffee County  
3 Elections Board who was there for that work, right?

4 A Yes, sir.

5 Q And to the best of your  
6 understanding, was Eric Chaney that person or do  
7 you not know?

8 A I don't know.

9 Q All right. Go to page 62, January 7,  
10 2021 at 2:21 p.m. There's a young man coming in in  
11 a red hat. Do you know who that is?

12 A I do not.

13 Q All right. Go to page 72. So if you  
14 look at 72 and 73 together, January 7, 2021,  
15 between 4:46 and 4:49 p.m., here we see Scott Hall  
16 and the individual who came in with him. We see  
17 them leaving the elections office, right?

18 A Yes.

19 Q The individual that came in with him  
20 has a blue backpack, right?

21 A Yes.

22 Q Do you know what was in that

1           backpack?

2                   A       I do not.

3                   Q       Mr. Hall leaves with a black backpack  
4                   and a brown bag of some sort. Do you see that?

5                   A       Yes, sir.

6                   Q       Do you know what was in those bags?

7                   A       No.

8                   Q       Do you know whether Mr. Hall or his  
9                   colleague took anything out of the Coffee County  
10                  elections office that they did not bring in?

11                  A       No.

12                  Q       You just don't know?

13                  A       I don't know.

14                  Q       Would that be -- who would you ask if  
15                  you wanted to know?

16                  A       One of the team members.

17                  Q       Okay.

18                           MR. CROSS: If we can get an answer  
19                  to that, too.

20                           MS. CLARK-PALMER: Who were the  
21                  people you said? I missed that. Who are the  
22                  people you want to know whether or not they took

1 anything back?

2 MR. CROSS: Well, the question would  
3 be whether any -- whether SullivanStrickler knows  
4 if anyone took anything out of the elections office  
5 that they did not bring in.

6 MS. CLARK-PALMER: Okay.

7 MR. CROSS: And, in particular,  
8 whether anyone took any of the voting equipment out  
9 of the office. Thank you.

10 BY MR. CROSS:

11 Q All right. Flip to pages 76 and 77.  
12 So here we have someone coming into the elections  
13 office, January 7, 2021 at 5:24 p.m. Do you know  
14 who that is?

15 A I do not.

16 Q But on January 7, 2021, the only  
17 people that SullivanStrickler had in the office  
18 were the four we've talked about?

19 A Yes, sir.

20 Q Okay. Flip to page 80. The two  
21 individuals in baseball caps coming into the office  
22 at 6:53 p.m. on January 7, 2021, do you know who

1           those folks are?

2                   A       I do not.

3                   Q       Flip to pages 84 and 85. So here we  
4           are January 7, 2021 at 7:42 and 7:43 p.m., and this  
5           is when we see the SullivanStrickler team leave,  
6           right?

7                   A       Yes, sir.

8                   Q       And on page 72, it's Paul Maggio  
9           and -- and Jim Nelson leaving, right?

10                  A       Correct.

11                  Q       It looks like they're leaving with  
12           the same bags they brought in, right?

13                  A       Yes, sir.

14                  Q       And then in page 85, we see Ms. Naik  
15           and Ms. Jackson leaving, right?

16                  A       Yes, sir.

17                  Q       Are they leaving with the same bags  
18           they brought in?

19                  A       Yes.

20                  Q       All right. Flip to the last page,  
21           87. So now we're at January 7, 2021 at 7:49 p.m.  
22           There's a white car out front. Do you see that?

1 A Yes, sir.

2 Q Do you know whose vehicle that is?

3 A I do not.

4 Q Not one of the vehicles that anyone  
5 from SullivanStrickler drove, or you don't know?

6 A It's not their vehicles that I know  
7 that they own.

8 Q Okay.

9 A Do you know what I mean?

10 Q Yes.

11 A Okay.

12 Q Yes. That's good.

13 Did anyone from SullivanStrickler  
14 ever go back to Coffee County after January 7 to do  
15 any additional work?

16 A No.

17 Q So just the one day?

18 A One day.

19 Q Let me show you Exhibit 11.

20 (Felicetti Deposition Exhibit Number 11  
21 marked for identification.)

22 THE WITNESS: Do you mind if I take a



1 bio break? Is that okay?

2 MR. CROSS: No. Any time you want.

3 VIDEOGRAPHER: The time is 11:31 a.m.

4 We are off video record.

5 (Recess from 11:31 a.m. to 11:39 a.m.)

6 VIDEOGRAPHER: The time is 11:39 a.m.

7 We are back on video record.

8 MR. CROSS: Okay. Do you -- does he  
9 have 12? Oh, he does. Okay.

10 THE WITNESS: Yeah. Yeah.

11 BY MR. CROSS:

12 Q Grab Exhibit 20, if you would.

13 MR. SPARKS: Exhibit 11.

14 BY MR. CROSS:

15 Q I'm sorry, Exhibit 11. It's the tab  
16 numbers. Flip to -- wait a minute, are there not  
17 page numbers on this one? There's not. Okay.

18 So flip like two full pages and  
19 you'll see a picture of a young man, it looks like,  
20 in blue pants, blue sweater, January 8, 2021 at  
21 8:53 a.m.

22 Do you see that?

1                   A       Yes, sir.

2                   Q       He's walking out holding some type of  
3 equipment. Do you see that?

4                   A       Yes.

5                   Q       And then at 8:53 a.m., he's heading  
6 back into the office in a black mask. Do you see  
7 that?

8                   A       Yes, sir.

9                   Q       Okay. And he's leaving again, it  
10 says 8:55 a.m., with some equipment on sort of a  
11 rolling cart. Do you see that?

12                  A       Yes, sir.

13                  Q       Do you know this individual?

14                  A       No.

15                  Q       Do you have any reason to believe one  
16 way or the other whether this person is affiliated  
17 with SullivanStrickler?

18                  A       That there would be -- well,  
19 there's -- I don't know how to answer that. Can  
20 you rephrase the question?

21                  Q       Yeah. Sorry, that's not good.  
22 That's a -- that's a lawyer question.

1 A Yeah.

2 Q Is this person affiliated with  
3 SullivanStrickler?

4 A No.

5 Q Do you know what equipment he's  
6 rolling out?

7 A It looks like a printer maybe, but I  
8 can't -- no.

9 Q You don't know?

10 A No.

11 Q That's fine.

12 MR. CROSS: All right. And we were  
13 looking at, it looks like, pages 4, 5, and 6 of  
14 Exhibit 11, just for the record.

15 BY MR. CROSS:

16 Q Okay. The photos that I've shown you  
17 today from the security footage outside of the  
18 office, have you seen those before today?

19 A I have not.

20 Q Did anyone on the SullivanStrickler  
21 team try to evade any of the surveillance cameras  
22 at the elections office when they were doing their

1 work?

2 A No.

3 Q And would they have had any reason to  
4 do that?

5 A No, sir.

6 Q Because the firm's understanding at  
7 the time, and still today, is that it had all the  
8 legal rights to do what it was doing?

9 A Yes, sir.

10 Q All right. Let me hand you  
11 Exhibit 12.

12 (Felicetti Deposition Exhibit Number 12  
13 marked for identification.)

14 BY MR. CROSS:

15 Q All right. So take a moment, if you  
16 need, and flip through Exhibit 12.

17 Do you recognize these as photos that  
18 were produced by Mr. Maggio and that were taken by  
19 the team on January 7, 2021 in the elections  
20 office?

21 A Yes, sir.

22 Q Okay. And we talked before earlier

1           that Ms. Jackson, part of her responsibility was to  
2           document the work, including taking photos.

3                           Do you recall that?

4                   A       Yes, sir.

5                   Q       Did she take these photos?

6                   A       Yes.

7                   Q       Is your understanding that she took  
8           all of the photos?

9                   A       Yes.

10                  Q       Did anyone else with  
11       SullivanStrickler take any photos or video?

12                  A       No.

13                  Q       Okay. Did anyone else in the room --  
14       sorry, strike that.

15                           Did anyone else who was on-site in  
16       Coffee County on January 7, 2021 take any photos or  
17       video?

18                  A       Not that I know of. I don't know.

19                  Q       Did you discuss that specifically  
20       with any of the team members?

21                  A       I did.

22                  Q       And no one on the team was aware of

1 anyone else taking photos or video?

2 A I was directed to Jennifer Jackson  
3 whenever it came to that.

4 Q All right. Is it fair to say the  
5 team's understanding or recollection from the  
6 events was that she was the only one who took  
7 photos and video?

8 A Yes, sir.

9 Q Okay. All right. Let's start with  
10 the first page.

11 A Sure.

12 Q And it's got this little production  
13 number ending in 236. These are pictures of  
14 CompactFlash drives, right?

15 A Yes, sir.

16 Q And each CompactFlash drive has a  
17 little note next to it with the project number  
18 SSA1722, right?

19 A Yes, sir.

20 Q And then below the project number  
21 there's other information. What is the information  
22 that's recorded on each of those notes?

1                   A       The CF number is a tracking code.  
2                   And the -- the word next to it or -- yeah, the word  
3                   to the right of the CF number is the label of the  
4                   machine, the device that was -- that the cards were  
5                   removed from.

6                   Q       Okay. So each of the CompactFlash  
7                   drives, when the team arrived, was installed in a  
8                   device. The team pulled the CompactFlash out of  
9                   the device, copied it. Is that right?

10                  A       No.

11                  Q       Oh, sorry. I'll tell you what, let  
12                  me just ask. Walk me through the steps the team  
13                  took to copy the -- the CompactFlash drives that we  
14                  see in this picture.

15                  A       As I understand it, the CompactFlash  
16                  disks were given to Karuna to image. And I can  
17                  walk you through that process if you want to hear  
18                  it.

19                  Q       We will in a moment.

20                  A       Okay.

21                  Q       Who gave her the CompactFlash?

22                  A       It would have been -- there were a

1           number of people. It would have been either Misty  
2           Hampton -- I would say Misty Hampton, because she  
3           directed, "Grab this, get this, get that, get  
4           this."

5                   Q       Misty Hampton was the elections  
6           supervisor in Coffee County at the time?

7                   A       As I understand it, yes.

8                   Q       Okay. And you anticipated where I  
9           was going to go.

10                   Did anyone beyond Ms. Hampton direct  
11           the SullivanStrickler team what to copy?

12                   A       Yes, I believe so.

13                   Q       What's your understanding about  
14           others who gave direction?

15                   A       Misty directed the larger percent,  
16           but as I understand it, Cathy Latham also provided  
17           direction on what was required for collection. And  
18           Scott Hall had said, "Get -- are you sure you're  
19           getting everything? Are you getting everything?"  
20           So that was interpreted as, "Make sure you get  
21           everything that you can."

22                   Q       Okay. And what was the idea for the



1 SullivanStrickler team? Essentially if there was a  
2 device in the office that had data on it, the  
3 team's task was to extract that data to the extent  
4 they could?

5 A Yes, sir.

6 Q So looking back at the first picture  
7 in Exhibit 12, so let's just take the fourth one  
8 down on the left. So you've got the project number  
9 and then "CF04." And then there's that Braxton-2."  
10 Or what is that word?

11 A It looks -- it does look like Braxton  
12 or Broxton, but that information also would be  
13 tracked in the chain-of-custody log that was  
14 produced.

15 Q And do you see next to that it looks  
16 like there's one that refers to Ambrose?

17 A Yes, sir.

18 Q Do you understand that -- that the  
19 references here on these notes correlate to voting  
20 precincts in Coffee County, or do you know?

21 A I do not. We reference them as just  
22 labeled.

1                   A       And I think I referenced it as that.  
2       I don't know what this is.

3                   Q       Oh, I see.   Okay.

4                   A       Do you know what I mean?   I think my  
5       original comment was, "I believe this is one of our  
6       deliverables."   I don't think it is.

7                   Q       So --

8                   A       Sorry about that.

9                   Q       No, no, no.   That's no problem at  
10       all.

11                               Flip to 244.   The desktop computer  
12       that's standing up here on the desk, used with the  
13       EMS server, that's a Dell computer.   Do you see  
14       that?

15                   A       Yes, sir.

16                   Q       Okay.   Now, if you flip to 248,  
17       there's a reference to "EMS 01," and it says, "Dell  
18       Basic Warranty."   And if you look, you can see a  
19       keyboard in the top right corner, you can see the  
20       cables off to the left.

21                               Does it look like this is -- what's  
22       pictured here is that desktop computer?

1 A It does.

2 Q Okay.

3 A Sorry I had to go back.

4 Q No, no.

5 A Okay.

6 Q I'm glad you did that. That's very  
7 helpful.

8 So then we come to 254. We have a  
9 picture of the same Dell desktop. You can actually  
10 see it now sitting next to the router on the table  
11 in the EMS server room.

12 Do you see that?

13 A Yes.

14 Q And there's a Post-it note on it. Do  
15 you know whether that Post-it note is a password  
16 that is used for that computer?

17 A I wouldn't know. We don't need  
18 passwords.

19 Q Okay.

20 A So we wouldn't --

21 Q I was going to ask you that.

22 A Okay.

1                   Q       The forensic copying that you guys  
2       did in Coffee County, you were able to take all of  
3       the data that you took without needing passwords to  
4       any devices?

5                   A       That is correct.

6                   Q       And how -- walk me through sort of  
7       how that's possible.

8                   A       When -- passwords that are typically  
9       provided, unless they -- that are on local  
10      machines, or on machines, if they are not  
11      encrypting the actual OS at boot, when it boots,  
12      you can forensically image -- we're only looking at  
13      a source.

14                               So we can look at -- here's an  
15      example: So if this laptop here had a password on  
16      it, when we attach our device and we boot and we  
17      point to that to collect, it's just looking at a  
18      block of data or the data that's on the disk. And  
19      also pieces of the disk that may not contain data,  
20      but fragments of data. So imagine it just  
21      collecting that, whatever's on the disk, then  
22      creating an image of that, and then taking that off

1 with it.

2 Now, if I was looking to do something  
3 targeted where you said to me, you know, "We really  
4 only want these files," without doing a forensic  
5 image, we would require a password to attach to the  
6 machine and then to filter down using Windows tree  
7 viewer or searching or whatever to grab the files.

8 But there's no need -- for the  
9 technologies that were here for us to need any  
10 passwords to gain that -- to forensically image  
11 them.

12 Q And the forensic image captures, if  
13 done correctly, all of the files, all of the data  
14 sitting on the device?

15 A Yes, sir.

16 Q Once the data is pulled off in that  
17 process, is a password needed to then access that  
18 data on whatever device it's copied to?

19 A Yes, sir.

20 Q So the -- the data that is -- that  
21 was taken -- I'll be more precise. The data that  
22 was copied in Coffee County, has anyone at

1 would upload the data to the ShareFile, and then  
2 whomever asked for access or was given access based  
3 on the attorneys, they would say, "All right. We  
4 need access for this, this, and this." We would  
5 create those accounts and then you would be able to  
6 pull the data down.

7 Does that paint a picture?

8 Q Yeah.

9 A Does that --

10 Q Thank you.

11 A You're welcome.

12 Q So for anyone accessing that data and  
13 wanting to actually look at the data itself, look  
14 at the files, they might need a password to the  
15 extent that any particular file is password  
16 protected at the time you collected it?

17 A And they would need a password from  
18 us. So everything that gets put on ShareFile is  
19 password protected. So they -- it would require a  
20 password no matter what to gain access to that  
21 data.

22 Q Okay. When the firm shared the data

1 from Coffee County via the ShareFile, it provided  
2 log-in credentials to the individuals who were  
3 given access to that data, right?

4 A Yes, sir.

5 Q And so the log-in credentials would  
6 be, what, a user name and a password?

7 A Yes.

8 Q And that -- once they logged in, they  
9 then would have access to -- to whatever was  
10 sitting on that ShareFile site for their user  
11 account?

12 A For their account, yes. So -- yes.  
13 So permissions based on access to certain areas  
14 within that ShareFile repository. And permissions,  
15 like "Ability to download, yes or no; ability to  
16 upload, yes or no; you know, admin rights, no,"  
17 this -- things like that.

18 Q If a user were to share their log-in  
19 credentials for your ShareFile site with another  
20 individual, you wouldn't have any way of knowing  
21 that, right?

22 A I don't know. I don't think we would

1 I know we talked before, you  
2 consolidate the data, then you upload it to the  
3 ShareFile site. That's done physically in the  
4 SullivanStrickler office?

5 A Right. So a copy is made,  
6 consolidated, that we discussed, of all of the  
7 targeted data that was collected. That -- those  
8 drives that were utilized to collect the data are  
9 then preserved with a preservation copy. So you  
10 have a working copy, a preservation copy. The  
11 preservation copy is then -- that data is then  
12 uploaded to the ShareFile.

13 Does that answer your question?

14 Q Yes.

15 A Okay.

16 Q Did SullivanStrickler require anyone  
17 who had -- was given access to the ShareFile for  
18 the Coffee County data to sign any kind of  
19 non-disclosure or any confidentiality agreement?

20 A No. We were working under the  
21 original agreement information.

22 Q So the way it would work is your



1 points of contact, like a Doug Logan or a Jim  
2 Penrose or Sidney Powell, would -- would reach out  
3 to SullivanStrickler and say, "Hey, I want you to  
4 share the Coffee County data with -- with this  
5 individual as well." And then you guys would give  
6 log-in credentials for the ShareFile to that  
7 individual?

8 A That's exactly right.

9 Q Does each individual have their own  
10 log-in credentials for ShareFile?

11 A Yes. And permissions.

12 Q Right.

13 You talked about this before. Each  
14 individual user may have some different  
15 permissions, meaning one user can upload and  
16 download, but another can only download?

17 A Or only have access to certain areas  
18 within ShareFile.

19 Q Are you aware that one or more of the  
20 individuals that you guys gave log-in credentials  
21 to shared their log-in credentials with -- with  
22 other individuals?

1           because otherwise it's going to throw -- it gets  
2           complicated on Exhibit Share. So just remind me at  
3           the end to mark this as an exhibit. We won't do it  
4           for now.

5           BY MR. CROSS:

6                   Q       Okay. So the check came for the  
7           Sidney Powell Engagement from Defending the  
8           Republic, Inc. And that's for the Coffee County  
9           work?

10                  A       Yes.

11                  Q       And do you know anything about that  
12           organization?

13                  A       I do not.

14                  Q       Okay. Let's see. Oh, was anybody  
15           able to identify the person who came in who was  
16           with Scott Hall on-site?

17                  A       No.

18                  Q       Did that person do anything on-site?

19                  A       Not as far as collections, no.

20                  Q       What did he do?

21                  A       As we understand it, he was with  
22           Scott Hall as a programmer.

1                   Q       And when you say "programmer," what  
2       do you mean?

3                   A       That's all I know.

4                   Q       Somebody who would program software  
5       or computers?

6                   A       Yes.

7                   Q       Okay. Did he have a computer or  
8       devices with him?

9                   A       I don't know.

10                  Q       Okay. Did he offer any direction or  
11       guidance to the SullivanStrickler team on what to  
12       do?

13                  A       He did not.

14                  Q       Okay. He was just there with Scott  
15       Hall --

16                  A       That's correct.

17                  Q       -- as a programmer?

18                  A       Correct.

19                  Q       Okay. Did anyone who was there that  
20       day on-site, to the knowledge of the firm or the  
21       team, take anything with them that they did not  
22       bring in themselves apart from data that was

1 page, below this black redacted line, do you see  
2 there's an indication of uploads and the user name  
3 is Doug Logan?

4 A Yes.

5 Q And then the files that indicate to  
6 the left, do you see how they all reference EMS?

7 A Yes.

8 Q Do you know why Doug Logan was  
9 uploading these EMS files to the SullivanStrickler  
10 ShareFile?

11 A I do not.

12 Q Do you know where those files came  
13 from?

14 A I do not.

15 Q Do you know what they are?

16 A I do not.

17 Q Okay. Then come to the next page  
18 ending in 141. You'll see Doug Logan's name  
19 continues. And then you get to Conan H. again,  
20 Conan Hayes. Do you see that?

21 A Yes.

22 Q And the first file indicates -- Conan

1 A Sure.

2 Q The SullivanStrickler team went in  
3 and scanned -- or sorry, copied thumb drives and it  
4 copied whatever data was on those thumb drives at  
5 the moment the team came in to copy them?

6 A Correct.

7 Q At the same time in parallel, Misty  
8 Hampton is scanning cast ballots with a scanner?

9 A Yes.

10 Q Do you know whether -- the scans that  
11 Misty Hampton created, whether those scans were  
12 also at some point provided to SullivanStrickler?

13 A Yes, they were put on a thumb drive  
14 for us to scan -- to forensically image.

15 Q Okay. Got it. Got it.

16 And was that done on the 7th or  
17 later?

18 A No, the same day. So the 7th.

19 Q Do you know what elections she was  
20 scanning ballots from?

21 A I don't know.

22 Q Okay. Did the team see anyone other

1           than Ms. Hampton scan ballots?

2                   A       Based on my discussion with the team,  
3           it was Misty. That's it.

4                   Q       So we've talked about a number of  
5           folks, and we looked at pictures outside the  
6           building. Let me just make sure I get a complete  
7           picture of the inside.

8                               So in the office during the day while  
9           SullivanStrickler was doing its work, it was  
10          obviously the four members of the SullivanStrickler  
11          team?

12                   A       Yes.

13                   Q       Cathy Latham was there for most of  
14          the day. Is that right?

15                   A       Yes.

16                   Q       And I think you said earlier she was  
17          helping provide some direction on what to copy?

18                   A       Yes.

19                   Q       Misty Hampton was there for most of  
20          the day, also providing some direction?

21                   A       Yes.

22                   Q       Scott Hall was there for most of the

1 everyone who received the data from Coffee County  
2 from SullivanStrickler, right?

3 There's at least one exception?

4 A One exception, yes.

5 Q Okay. Are you aware of anyone else  
6 who received data -- Coffee County data from  
7 SullivanStrickler through means other than the  
8 ShareFile site?

9 A I am not.

10 Q Was that something that you looked  
11 into?

12 A We did, yes. I looked into that.

13 Q Okay. And --

14 A Sorry.

15 Q No, please go ahead.

16 What can you tell me about the steps  
17 that were taken to try to collect data from the  
18 BMDs? What was the method?

19 A The only method that would have been  
20 feasible -- and this is -- I wasn't there -- would  
21 be to utilize Cellebrite, because of the Android OS  
22 that it has on the back-end --

1 Q Okay.

2 A -- as far as the operating system.  
3 So I would think Cellebrite would have been  
4 utilized.

5 Q Okay. And do you have any -- any  
6 information about why the team was unable to copy  
7 data from the BMDs, assuming that's the case?

8 A I do not, just that it -- they  
9 failed. That's all.

10 Q Okay.

11 A The collection failed and I don't  
12 know why.

13 Q Okay. I do not have any further  
14 questions. Just a few quick things similar to what  
15 we talked about earlier. We do want to get the  
16 complete ShareFile logs.

17 A Oh, as far as the ShareFile logs,  
18 what you have is what there is. There's a timeline  
19 limitation on ShareFiles' ability to produce logs  
20 after a certain time frame.

21 Q Okay. Let me make sure I understand  
22 that, because the logs that we have, it looks like



## CERTIFICATE OF NOTARY PUBLIC

I, FELICIA A. NEWLAND, CSR, the officer before whom the foregoing videotaped deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotype and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



FELICIA A. NEWLAND, CSR

Notary Public

My commission expires:

September 15, 2024